

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE GLOBAL BROKERAGE, INC. f/k/a
FXCM INC. SECURITIES LITIGATION

Master File No. 1:17-cv-00916(RA)(BCM)

CLASS ACTION

This Document Relates To: All Actions

DECLARATION OF JOSHUA BAKER

I, Joshua Baker, hereby declare:

1. I am an attorney admitted to practice before this Court. I am an attorney with The Rosen Law Firm, P.A., Court-appointed Lead Counsel for Lead Plaintiffs 683 Capital Partners, LP (“683 Capital”) and Shipco Transport Inc. (“Shipco”), and proposed Class Counsel. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so truthfully and accurately. I make this declaration, together with the attached exhibits, in further support of Plaintiffs’ Amended Motion for Class Certification and Appointment of Class Representatives and Class Counsel. Dkt. No. 174.

2. Attached hereto as Exhibit 7 is a true and correct copy of the Rebuttal Report on Market Efficiency by Dr. Adam Werner dated July 27, 2020.

3. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the transcript of the deposition of Joseph Patt as corporate representative of 683 Capital.

4. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of the deposition of Sergey Regukh.

5. The documents that 683 Capital and Shipco produced after their respective depositions were largely duplicative of their prior productions and not relevant to the claims or defenses alleged in this Action. These documents consisted primarily of emails received from brokers, confirming the execution of the trades in FXCM securities that were reflected in documents produced by 683 Capital and Shipco in November 2019. The documents did not evidence any transactions not previously disclosed. These additional productions were made at Defendants’ insistence and were substantially completed on May 29, 2020, two weeks before Defendants’ opposition to Plaintiffs’ amended motion for class certification was due.

6. On May 28, 2020, I wrote to counsel for Defendants and advised that 683 Capital and Shipco were willing to discuss reopening their depositions for additional questioning with respect to the additional production of documents post-dating their respective depositions. Defendants did not respond to this offer. Defendants have not claimed that these additional productions were deficient.

DECLARATION OF JOSHUA BAKER

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 27, 2020, in Jenkintown, Pennsylvania.

/s/ Joshua Baker
Joshua Baker

DECLARATION OF JOSHUA BAKER

CERTIFICATE OF SERVICE

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On July 27, 2020, I served true and correct copies of the foregoing DECLARATION OF JOSHUA BAKER and EXHIBITS 7-9, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 27, 2020, at Jenkintown, Pennsylvania.

/s/ Joshua Baker
Joshua Baker